

TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.

ATTORNEYS AT LAW
40 EXCHANGE PLACE
18TH FLOOR
NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE
(212) 482-1303 FAX
WWW.TALKINLAW.COM
EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE:
5100 DORSEY HALL DRIVE
SUITE 100
ELLCOTT CITY, MD 21042
410-964-0300

NEW JERSEY OFFICE:
2500 PLAZA 5
HARBORSIDE FINANCIAL CENTER
JERSEY CITY, NJ 07311
201-342-6665

April 30, 2024

Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

VIA ECF

Re: United States v. Avraham Eisenberg
23 Cr. 10 (AS)

Dear Judge Subramanian:

As the Court is aware, defendant Avraham Eisenberg (“Eisenberg”) was convicted after a trial on April 18, 2024. As a result, Eisenberg’s renewal of his Motion for a Judgment of Acquittal pursuant to FRCP 29 and Motion for a New Trial pursuant FRCP 33 are currently due on May 2, 2024. By this letter, and with the consent of the government, Eisenberg respectfully requests an extension of the due dates for these motions to September 9, 2024. The reason for the lengthy request is that should Eisenberg retain new counsel, the complex nature of these motions will require incoming attorneys to expend a great deal of time reviewing the record, becoming familiar with the facts of the case and then preparing the motions. In the event that Waymaker and Talkin, Muccigrosso & Roberts continue as counsel, Mr. Greenspan and I will be chiefly responsible for the motions. We are currently preparing for a trial in the Eastern District of New York that commences with jury selection on June 3, 2024 and should last at least three weeks. Should the Court grant this motion, the government respectfully requests that the Court defer setting dates for responses and replies for forty-five days to allow the assigned Assistant United States Attorneys to solidify their respective trial schedules and report back to the Court.

Thank you for Your Honor’s consideration of these requests.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Thomas Burnett (by ECF)
AUSA Peter Davis (by ECF)
SAUSA Tian Huang (by ECF)